

# **EXHIBIT 3**

9/19/2024

Richard Kadrey, et al. v. Meta Platforms, Inc. Todor Mihaylov, Ph.D.  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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IN RE MATTER OF:	)
RICHARD KADREY, et al.,	)
Plaintiff,	)
vs.	) C.A. NO.:
META PLATFORMS, INC.,	) 3:23-cv-03417-VC
Defendant.	)
	)

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\*\* HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY \*\*

UNDER THE PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF TODOR MIHAYLOV, Ph.D.

Palo Alto, California

Thursday, September 19, 2024

Stenographically Reported by:

HEATHER J. BAUTISTA, CSR, CRR, RPR, CLR

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1 prepare yourself to testify with respect to that  
2 topic.

3 THE WITNESS: Yeah. So first the topic as  
4 a whole is very broad.

5 Q. (By Ms. Poueymirou) Um-hum.

6 A. So if this was the only line, I -- I know  
7 about the topic. I didn't do any particular work  
8 for this particular topic, just because it's like  
9 a -- for us it's like a day-to-day thing --

10 Q. Right.

11 A. -- like ablations in general. I don't know  
12 what you mean actually by the topic, yeah.

13 Q. Okay.

14 A. So --

15 Q. So is it fair to say that what you're  
16 saying is ablations is part of your normal  
17 day-to-day work so you did not do any unique  
18 preparation for giving testimony on that topic? Is  
19 that a fair way to put it?

20 A. Yes.

21 MR. WEINSTEIN: You can just answer yes.

22 THE WITNESS: Yes.

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1 I, HEATHER J. BAUTISTA, CSR No. 11600,

2 Certified Shorthand Reporter, certify:

3 That the foregoing proceedings were taken  
4 before me at the time and place therein set forth,  
5 at which time the witness declared under penalty of  
6 perjury; that the testimony of the witness and all  
7 objections made at the time of the examination were  
8 recorded stenographically by me and were thereafter  
9 transcribed under my direction and supervision; that  
10 the foregoing is a full, true, and correct  
11 transcript of my shorthand notes so taken and of the  
12 testimony so given;

13 (XX) Reading and signing was not requested/offered.

14 I further certify that I am not financially  
15 interested in the action, and I am not a relative or  
16 employee of any attorney of the parties, nor of any  
17 of the parties.

18 I declare under penalty of perjury under the  
19 laws of California that the foregoing is true and  
correct. Dated: September 23, 2024

20

21

22

  
HEATHER J. BAUTISTA, CSR, CRR, RPR, CLR